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*Via Electronic Filing*

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: *Ex Parte* Notice: *Terrestrial Use of the 2473-2495 MHz Band for Low-Power Mobile Broadband Networks* – IB Docket No. 13-213

Dear Ms. Dortch:

On June 22, 2016, Jay Monroe, Chairman of the Board of Directors and Chief Executive Officer of Globalstar, Inc. (“Globalstar”), L. Barbee Ponder IV, General Counsel & Vice President, Regulatory Affairs, for Globalstar, Tim Taylor, Vice President of Finance, Business Operations & Strategy, for Globalstar, and I met with Edward “Smitty” Smith, Legal Advisor to Chairman Tom Wheeler, regarding the Commission’s proposed rules in the above-captioned proceeding.<sup>1</sup> I also spoke with Mr. Smith by telephone on June 22.

In this meeting and on this call, Globalstar’s representatives urged that the Commission adopt rules in this proceeding to authorize an innovative broadband service, Terrestrial Low Power Service (“TLPS”). We explained that the rules the Commission proposed unanimously would serve the public interest by adding 22 megahertz to the nation’s broadband spectrum inventory. Importantly, Globalstar has demonstrated that TLPS does not interfere with other unlicensed services and, in fact, benefits adjacent-band Wi-Fi as it “offloads” other 802.11-based traffic onto a fourth, non-overlapping IEEE 802.11 channel and alleviates congestion in the 2.4 GHz ISM band. Simply put, Wi-Fi users will be better off with the expanded capacity made available via TLPS. We also noted that, if the Commission prevents TLPS deployment on Channel 14, the top portion of the 2.4 GHz ISM band will continue to be underutilized. Measured by what is best for consumers, rather than what is best for Globalstar’s potential competitors, the right decision in this proceeding is clear. The Commission should adopt rules authorizing TLPS.

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<sup>1</sup> *Terrestrial Use of the 2473-2495 MHz Band for Low-Power Mobile Broadband Networks; Amendments to Rules for the Ancillary Terrestrial Component of Mobile Satellite Service Systems*, Notice of Proposed Rulemaking, 28 FCC Rcd 15351 (2013).

During this meeting and call, we also discussed a potential framework to permit third parties to obtain opportunistic use of Channel 14 where Globalstar has not deployed TLPS, while ensuring that licensed and unlicensed services are not disrupted. We noted that an essential element of a successful opportunistic use framework would be Globalstar's Network Operating System, to protect Globalstar's Mobile Satellite Service and other services from harmful interference.

We emphasized the need to balance carefully the concerns raised by competitors and other parties regarding potential interference from any new services with the Commission's goals of encouraging investment, innovation, competition, and efficient use of scarce spectrum. We noted as well the incentive of incumbents to saddle new entrants with burdensome micro-regulation and onerous barriers to entry as a means of thwarting competition, and the resulting need for thoughtful policy that encourages investment.

Pursuant to section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2), this *ex parte* notification is being filed electronically for inclusion in the public record of the above-referenced proceeding.

Respectfully submitted,

/s/ Regina M. Keeney  
Regina M. Keeney

cc: Edward "Smitty" Smith